

8683

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

Before me, Taylor Wilkins, Jr., a Notary Public in and for said County,  
personally appeared J. D. Stapleton who being by me  
duly sworn deposes and says that the property sued for in the complaint of

filed in said Court, to-wit:

1967 Green Chevrolet 1-1/2 ton truck plus two (2) Poulan chain saws  
plus one (1) paperwood binder and chain

belongs to J. D. Stapleton, the plaintiff.

Sworn to and subscribed before me this 28th

day of April, 19 69

Notary Public

STATE OF ALABAMA

BALDWIN COUNTY

IN THE CIRCUIT COURT OF

BALDWIN COUNTY

I J. D. Stapleton  
KNOW ALL MEN BY THESE PRESENTS, That ~~we~~

, Principal, and  
, Sureties, are held and  
firmly bound unto Albert Koen, his heirs, executors and admin-  
istrators in the sum of FIFTY and NO/100 (\$50.00) Dollars,  
for the payment of which we jointly and severally bind ourselves, our heirs, executors and adminis-  
trators.

Sealed with our seals and dated the \_\_\_\_\_ day of \_\_\_\_\_, 19\_\_\_\_\_.

The condition of the above obligation is such that whereas, the above bound

J. D. Stapleton has on the 28th day of  
April, 19 69 sued out a writ of detinue in the Circuit Court of BALDWIN  
County, returnable to the said Circuit Court against the said Albert Koen

for the recovery of the following  
described property, to-wit:

1967 Green Chevrolet 1-1/2 ton truck plus two(2) Poulan chain saws  
plus one(1) paperwood binder and chain

Now, if the said J. D. Stepleton shall fail in said suit  
and shall pay to the said Albert Koen, the defendant in  
said suit, all such costs and damages as he may sustain by the wrongful complaint, then this obligation to  
be void, otherwise, to remain in full force and effect.

Taken and approved this 29 day of April, 19 69 J. D. Stapleton (SEAL)

Clerk, Circuit Court

8683

No. ....

THE STATE OF ALABAMA

COUNTY

CIRCUIT COURT

Plaintiff

vs.

Defendant

Detinue — Affidavit and Bond

FILED

Filed this day of APR 29 1969, 19.

ALICE J. DUCK

CLERK  
REGISTER  
Clerk

Now, if the said \_\_\_\_\_ shall well and truly, within  
thirty days after the determination of said suit, if the said \_\_\_\_\_  
be cast in said suit, deliver the property replevied, and also pay all the costs and such damages for de-  
tention as may accrue from said detention, then this obligation to be void, otherwise to remain in full  
force and effect.

And we, and each of us, hereby waive all rights of claim of exemption we or either of us have  
now, or may hereafter have, under the Constitution and Laws of Alabama, and \_\_\_\_\_ hereby  
severally certify that \_\_\_\_\_ have property free from all encumbrance to the full amount of the  
above bond.

Witness our hands and seals, this 8<sup>th</sup> day of May 1969

Taken and approved,

5/8/69 19  
J. D. Stapleton  
Sheriff.

J. D. Stapleton (L.S.)  
\_\_\_\_ (L.S.)  
\_\_\_\_ (L.S.)  
\_\_\_\_ (L.S.)

VOL

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PLAINTIFF

No. \_\_\_\_\_

*The State of Alabama,*

BALDWIN COUNTY.

CIRCUIT COURT.

**SHERIFF'S OFFICE**

J. D. Stapleton

vs. Plaintiff.

Albert Koen

Defendant.

**DETINUE REPLEVIN BOND, DEFENDANT**

Filed \_\_\_\_\_ 19 \_\_\_\_\_

Sheriff.

Sheriff's Execution Docket, page \_\_\_\_\_

THE STATE OF ALABAMA, }

COURT.

BALDWIN

COUNTY. }

Term, 19\_\_

KNOW ALL MEN BY THESE PRESENTS:

That we, J. D. Stapleton

are held and firmly bound unto Albert Koen

in the sum of TWO THOUSAND (\$2,000.00) Dollars,

for which payment, well and truly to be made, we bind ourselves, our heirs, executors and administrators, jointly and severally, firmly by these presents.

Sealed with our seals and dated, this \_\_\_\_ day of \_\_\_\_ 19\_\_

The Condition of the above Obligation is Such, That whereas the said plaintiff

did on the 29 day  
of April 19 69, sue out of the Circuit

Court of said County a writ in detinue, directed to any Sheriff of the State of Alabama, and commanding him to take into his possession the following property, sued for in action of detinue, to wit:

1967 Green Chevrolet 1-1/2 ton truck plus two (2)

Poulan chain saws

which said writ was placed in the hands of Taylor Wilkins

Sheriff of the County of Baldwin, on the 29 day

of April 19 69, and executed by him on the 29th day of

April 19 69, by taking into his possession

Same as above

and whereas the above named found plaintiff

ten (10)

has within ~~10~~ days from the execution of said writ entered into this bond as required by law, and hereby obtain possession of said property.

The State of Alabama,  
Baldwin County

CIRCUIT COURT

No. ....

April 28 19 69

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Albert Koen

to appear within thirty days from the service of this writ, in the Circuit Court to be held for said County at the place of holding the same, then and there to answer the complaint of

J. D. Stapleton

Witness my hand this 29 day of Apr 19 69

Alice J. Duck, Clerk

COMPLAINT

J. D. Stapleton

Albert Koen

Plaintiff

Versus

Defendant

The plaintiff claims of the defendant the following personal property, to-wit:

1967 Green Chevrolet 1-1/2 ton truck plus two (2) Poulan chain  
saws plus one (1) paperwood binder and chain

with the value of the hire or use thereof during the detention, to-wit:

from 19 , to 19

FILED

APR 29 1969

ALICE J. DUCK  
CLERK  
REGISTER

[Signature]

Plaintiff's Attorney.

No. 4683 Page \_\_\_\_\_

**State of Alabama**

Baldwin County

**CIRCUIT COURT**

J. D. Stapleton

Plaintiff...

VS.

Albert Koen

Defendant...

**Detinue Summons and Complaint**

Filed **FILED**, 19...

APR 29 1969

..., Clerk

**ALICE J. DUCK** CLERK  
REGISTER

Taylor Wilkins  
Plaintiff's Attorney

Defendant's Attorney

To the Sheriff of said County:

Whereas, the Plaintiff in the within stated cause has made affidavit and given bond as required by law you are hereby required to take the property mentioned in Complaint into your possession unless the Defendant gives bond payable to the Plaintiff with sufficient surety in double the amount of the value of the property, with condition that if the Defendant is cast in the suit he will within thirty days thereafter, deliver the property to the Plaintiff, and pay all damages and costs which may accrue from the detention thereof.

Alice J. Duck Clerk

Defendant lives at

**Ellisville, Alabama**

Received in office

..., 19...

..., Sheriff

I have executed this summons

this ..., 19...

by leaving a copy with

..., Sheriff

..., Deputy Sheriff

Printed by Moore Printing Co.

The State of Alabama,  
Baldwin County

CIRCUIT COURT

No. \_\_\_\_\_

April 28

19 69

To Any Sheriff of the State of Alabama—Greetings:

You Are Hereby Commanded to Summon Albert Koen

to appear within thirty days from the service of this writ, in the Circuit Court to be held for said County

at the place of holding the same, then and there to answer the complaint of \_\_\_\_\_

J. D. Stapleton

Witness my hand this 29 day of Apr 19 69

Alice J. Duck, Clerk

COMPLAINT

J. D. Stapleton

Albert Koen

Plaintiff

Versus

Defendant

The plaintiff claims of the defendant the following personal property, to-wit:

1967 Green Chevrolet 1-1/2 ton truck plus two (2) Poulan chain  
saws plus one (1) paperwood binder and chain

with the value of the hire or use thereof during the detention, to-wit:

from \_\_\_\_\_ 19\_\_\_\_, to \_\_\_\_\_ 19\_\_\_\_

FILED

APR 29 1969

ALICE J. DUCK CLERK  
REGISTER

[Signature] Plaintiff's Attorney.

State of Alabama  
Baldwin County

CIRCUIT COURT

J. D. Stapleton  
Plaintiff...

VS.

Albert Koen  
Defendant...

Detinue Summons and Complaint

Filed **FILED** \_\_\_\_\_, 19\_\_\_\_  
APR 29 1969 \_\_\_\_\_, Clerk

ALICE J. DUCK CLERK  
REGISTER

Taylor Wilkins  
Plaintiff's Attorney  
\_\_\_\_\_  
Defendant's Attorney

To the Sheriff of said County:

Whereas, the Plaintiff in the within stated cause has made affidavit and given bond as required by law you are hereby required to take the property mentioned in Complaint into your possession unless the Defendant gives bond payable to the Plaintiff with sufficient surety in double the amount of the value of the property, with condition that if the Defendant is cast in the suit he will within thirty days thereafter, deliver the property to the Plaintiff, and pay all damages and costs which may accrue from the detention thereof.

Alice J. Duck Clerk

Defendant lives at

Ellisville, Alabama

RECEIVED  
Received in Office

APR 29 1969, 19\_\_\_\_

\_\_\_\_\_, Sheriff

I have executed this summons

this April 29, 19 69  
by leaving a copy with

Albert Koen

Not Found as to defendant (he is deceased). I have attached one 1967 Green Chevrolet 1 1/2 ton truck, Two Poulan Chain saws and stored property in the yard of complainant.

Paperwood binder and chain was not found.

Pay made bond 5/8/69  
by J. D. Stapleton

Taylor Wilkins, Sheriff

H. B. Brown, Deputy Sheriff

44 miles R. T.  
Printed by Moore Printing Co.